

FEB 14 2019

U.S. District Court
Eastern District of MOUNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MISSOURI
DIVISIONJane JD Doe, individually and as
Next Friend for minor children
Janie Doe and Johnny Doe, her
natural children.

Complaint for a Civil Case

(Write the full name of each plaintiff
who is filing this complaint. If the
names of all the plaintiffs cannot fit in
the space above, please write "see
attached" in the space and attach an
additional page with the full list of
names.)

Case No.

(to be assigned by Clerk of
District Court)

Plaintiff requests trial by jury:

☒ Yes ☐ Nov. The 22nd Circuit Court of Missouri,
Michael Stelzer, individually, Elizabeth
Hogan, individually, Theresa Counts,
Burke, individually and Steven Ohmer,
individually; unidentified Bailiffs,
Clerks and employees of 22nd Circuit
Court of Missouri(Write the full name of each defendant.
The caption must include the names of
all of the parties. Fed. R. Civ. P. 10(a).
Merely listing one party and writing "et
al." is insufficient. Attach additional
sheets if necessary.)CIVIL COMPLAINT

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the \$400.00 filing fee or an application to proceed without prepaying fees or costs.

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Jane JD Doe
Street Address	P.O. Box 345
City and County	Edwardsville; Madison County
State and Zip Code	Illinois 62025
Telephone Number	withheld to protect anonymity
E-mail Address	" " " "

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	22nd Judicial Circuit Court, State of Missouri
Job or Title	
Street Address	10 N. Tucker Blvd.
City and County	St. Louis St. Louis City
State and Zip Code	Missouri 63103
Telephone Number	(314) 622-4500
E-mail Address	

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant. If you are suing for violation of your civil rights, you must state whether you are suing each defendant in an official capacity, individual capacity, or both.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the information for this case. (Include all information that applies to your case)

A. Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title III of the Americans with Disabilities Act (public accommodations)
18 U.S.C. § 1983
U.S. Constitution, Amendments 4, 5, and 14

B. Suit against the Federal Government, a federal official, or federal agency

List the federal officials or federal agencies involved, if any.

none

C. Diversity of Citizenship (not basis for suit)

These are cases in which a citizen of one State sues a citizen of another State or nation, and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

1. The Plaintiff(s)

The plaintiff, (name) Jane JD Doe, is a citizen of the
State of (name) Illinois.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

If the defendant is an individual

The defendant, (name) Michael F. Stelzer, is a citizen
of the State of (name) Missouri Or is a citizen
of (foreign nation) N/A

If the defendant is a corporation

The defendant, (name) 22nd Circuit Court
^{organized}
is ~~incorporated~~ under the laws of the State of (name)
Missouri, and has its principal place of
business in the State of (name) Missouri Or
is incorporated under the laws of the State of (foreign nation)
N/A, and has its principal place
of business in (name) N/A

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because (explain):

N/A because of Federal Question Jurisdiction

2. The Defendant(s)

If the defendant is an individual

The defendant, (name) Theresa Counts Bunce, is a citizen
of the State of (name) Missouri Or is a citizen
of (foreign nation) N/A

~~If the defendant is a corporation~~

The defendant, (name) Steven Ohmer
is a citizen
~~is incorporated under the laws of the State of (name)~~
Missouri, and has its principal place of
business in the State of (name) N/A Or
is incorporated under the laws of the State of (foreign nation)
N/A, and has its principal place
of business in (name) N/A

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. ~~The Amount in Controversy~~

~~The amount in controversy---the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake---is more than \$75,000, not counting interest and costs of court, because (explain):~~

2. The Defendant(s)

If the defendant is an individual

The defendant, (name) Elizabeth Byrne Hogan, is a citizen
of the State of (name) Missouri Or is a citizen
of (foreign nation) N/A

If the defendant is a corporation

The defendant, (name) _____
is incorporated under the laws of the State of (name) _____
_____, and has its principal place of
business in the State of (name) _____ Or
is incorporated under the laws of the State of (foreign nation) _____
_____, and has its principal place
of business in (name) _____

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because (explain):

The defendants (name) unidentified Bailiffs, clerks and employees of the 22nd Judicial Circuit, State of Missouri are believed to be citizens of the state of Missouri.

III. Statement of Claim

Type, or neatly print, a short and plain statement of the FACTS that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
 2. When did it happen?
 3. Where did it happen?
 4. What injuries did you suffer?
 5. What did each defendant personally do, or fail to do, to harm you?
1. Plaintiff alleges a longstanding and widespread pattern of intentional and systematic discrimination against her by Defendants in violation of Title III of the ADA based on Plaintiff's disability and perception of having a disabling mental health condition.
 2. Plaintiff suffers from Major Depression, Generalized Anxiety and Post-Traumatic Stress Disorder as a result of domestic abuse as an adult and her history of childhood trauma, physical abuse, sexual assault and child sexual exploitation.
 3. Defendants engaged in a pattern of conduct to deny Plaintiff relief from domestic abuse and stalking she sought under the Adult Abuse Act on multiple occasions from 2003 to the present. One Adult Abuse matter was never ruled upon by the Court, nor was a meaningful hearing held on Plaintiff's Abuse Act Petition in order to protect the alleged abuser from being compelled to testify under oath concerning the abuse.
 4. Defendants acted in concert under the color of state law to deny Plaintiff due process in Court and to prevent her from appealing her case, by altering court records, destroying evidence of the abuser's admissions to the abuse held under seal of court, and by altering trial transcript(s) to remove evidence of Defendant's actions.

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments. (cont on 5b)

Plaintiff seeks appropriate injunctive relief, a stay of the underlying state court proceedings while this federal case is pending (or for removal to federal court under supplemental jurisdiction), an award of attorney's fees under 1983, monetary damages as appropriate to redress Plaintiff's injuries.

5. Plaintiff suffered further injury and was stripped of her custodial rights of the minor Plaintiff Janie Doe in furtherance of Defendant's conspiracy to violate Plaintiff's civil rights and based upon intentional discrimination and mental health stigma. Plaintiff was placed under a perpetual court supervised visitation order in retaliation for exercising her rights under the ADA, HIPAA and under state law, which resulted in Plaintiff being allowed to see her daughter Janie Doe for a maximum of twenty-four (24) hours per calendar year. This order has been in effect from November 2013 to the present day, injuring Plaintiff's emotionally and depriving them of free familial association.
6. Plaintiff suffers from extreme anxiety and distrust of the 22nd Circuit court judges, clerks and personnel, which caused Plaintiff to seek reasonable accommodations from the court under the ADA. Petitioner's accommodations were granted in part, denied in part.
7. Defendant Ohmer refused to honor the reasonable accommodation granted by the court on February 05, 2019, despite having been personally informed of those accommodations by the 22nd Circuit's ADA Administrator.
8. Defendants committed numerous acts of retaliation against Plaintiff for asserting her legal rights supplied by state & federal law and the U.S. Constitution, including permitting her legal services Attorney to withdraw in the middle of the representation without first affording Plaintiff a hearing, and then by repeatedly admonishing Plaintiff that she "needs to get a lawyer" for the ongoing case.
9. Without the ADA accommodations, Plaintiff is unable to fully and meaningfully participate in court as a pro se litigant and continues to be denied access to public accommodation facilities and services.

Do you claim the wrongs alleged in your complaint are continuing to occur now?

Yes ☒ No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒ No ☐

Do you claim punitive monetary damages?

Yes ☐ No ☒

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

Actual damages from emotional distress, court costs, fees, litigation expenses, attorney's fees, lost wages, adverse judgments, Guardian Ad Litem fees, medical expenses, travel expenses, lost consortium and reputational damages exceed \$84,600.00

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 14th day of February, 20 19.

Signature of Plaintiff(s) Gane, JD Doe, and as Next
Friend for Gane Doe and Johnny Doe